

MARIO N. ALIOTO, ESQ. (56433)
 LAUREN C. CAPURRO, ESQ. (241151)
 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
 2001 Union Street, Suite 482
 San Francisco, CA 94123
 Telephone: (415) 563-7200
 Facsimile: (415) 346-0679
 E-mail: malioto@tatp.com
 lauren russell@tatp.com

Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE CATHODE RAY TUBE (CRT))	MDL NO. 1917
ANTITRUST LITIGATION)	
_____)	Case No. 07-cv-5944-JST
This Document Relates to:)	
Indirect Purchaser Class Action)	INDIRECT PURCHASER PLAINTIFFS’
)	ADMINISTRATIVE MOTION TO
)	CONSIDER WHETHER ANOTHER
)	PARTY’S MATERIAL SHOULD BE
)	SEALED PURSUANT TO CIVIL LOCAL
)	RULES 7-11 AND 79-5(f)
)	
)	
)	The Honorable Jon S. Tigar
)	
)	
_____)	

Pursuant to Civil Local Rules 7-11 and 79-5(f), the Indirect Purchaser Plaintiffs (“IPPs”) hereby move the Court to consider whether material designated as confidential by defendant Chunghwa Picture Tubes, Ltd. (“Chunghwa”) should be filed under seal.

IPPs have reviewed and complied with this Court’s Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar (Mar. 14, 2022) and Civil Local Rule 79-5, including the requirement to file separate motions if a party seeks to file under seal a document containing “portions that more than one party bears the burden of showing is sealable.” Civil L.R. 79-5(f)(5). This motion relates solely to materials designated confidential by Chunghwa. IPPs are filing the following documents designated by Chunghwa as “CONFIDENTIAL” under the terms of the Stipulated Protective Order, ECF No. 306, provisionally under seal:

Material/Document – Page/Ex. #	Designating Entity
Gray highlighting on pages 4, 5, 7 of Indirect Purchaser Plaintiffs’ Opposition to Irico Group Corp. and Irico Display Devices Co., Ltd.’s Motion for Summary Judgment	Chunghwa Picture Tubes, Ltd.
Gray highlighting on pages 10, 11, 13, and 15 of Declaration of Mario N. Alioto in Support of Indirect Purchaser Plaintiffs’ Opposition to Irico Group Corp. and Irico Display Devices Co., Ltd.’s Motion for Summary Judgment (“Alioto Decl.”)	Chunghwa Picture Tubes, Ltd.
Exhibit 1 to Alioto Decl.: gray highlighting on pages 13-14 of Motion for Terminating or Alternative Sanctions dated March 20, 2023	Chunghwa Picture Tubes, Ltd.
Exhibit 45 to Alioto Decl.: CHU00030661-63 (Chinese original and certified English translation)	Chunghwa Picture Tubes, Ltd.
Exhibit 48 to Alioto Decl.: CHU00102864-65 (Chinese original and certified English translation)	Chunghwa Picture Tubes, Ltd.
Exhibit 55 to Alioto Decl.: CHU00102751-64 (Chinese original and certified English translation)	Chunghwa Picture Tubes, Ltd.
Exhibit 56 to Alioto Decl.: CHU00047657-74 (Chinese original and certified English translation)	Chunghwa Picture Tubes, Ltd.

Exhibit 64 to Alioto Decl.: CHU00031044-46 (Chinese original and certified English translation)	Chunghwa Picture Tubes, Ltd.
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Civil Local Rule 79-5 governs the filing under seal of documents in civil cases. In compliance with Civil Local Rule 79-5(f), IPPs submit this Motion in order to file (a) material designated by Chunghwa pursuant to the Stipulated Protective Order, ECF No. 0306, as “Confidential” or “Highly Confidential”; or (b) references to or quotations from material or data designated by Chunghwa pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential.” IPPs seek to file the above material under seal in good faith in order to comply with the Protective Order in this action and the applicable Local Rules. Under Civil L.R. 79-5(c) and (f), the parties that contend the material they have designated is confidential in nature bear the burden to establish that the designated information meets the requirements for sealing. *See Kamakana v. City of Honolulu*, 447 F.3d 1172, 1178-80 (9th Cir. 2006). IPPs understand that, given the Court’s direction at the hearing on Direct Purchaser Plaintiffs’ November 19, 2021 sealing motion (ECF No. 5966), the designated materials subject to this motion may not qualify for filing under seal. IPPs were unable to contact Chunghwa prior to filing this motion because Chunghwa is bankrupt and is no longer represented by counsel. Accordingly, IPPs respectfully submit this administrative motion pursuant to the Stipulated Protective Order and Civil Local Rule 79-5(f).

Dated: September 6, 2023

By: /s/ Lauren C. Capurro

Mario N. Alioto (56433)
 Lauren C. Capurro (241151)
 TRUMP, ALIOTO, TRUMP & PRESCOTT LLP
 2001 Union Street, Suite 482
 San Francisco, CA 94123
 Telephone: (415) 563-7200
 Facsimile: (415) 346-0679
 Email: malioto@tatp.com
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Lead Counsel for Indirect Purchaser Plaintiffs